

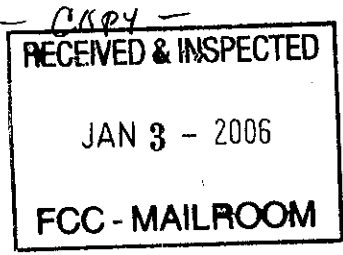
CGB-CC-0177

**JEANETTE DALEY** - Producer  
THE HOME SHOW, Las Vegas  
(702) 870-5000 Fax 870-5023  
[Jeanette@LasVegasHomeShow.com](mailto:Jeanette@LasVegasHomeShow.com)

The Home Show  
1501 Ten Palms Court  
Las Vegas NV 89117

12-31-05

To: Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
Attn: CGB Room 3-B431  
445 12<sup>th</sup> Street SW  
Washington DC 20554  
(202) 418-7092



Las Vegas Home Show . com  
On Television **EVERYDAY!**  
SATURDAY..... 10a.... UPN25 - Cox14  
SUNDAY..... 9a.... ABC13 - Cox13 HD 732  
SUNDAY..... 6:30p.... NBC 3 - Cox 3 HD 733  
MONDAY..... 1a.... UPN25 - Cox14  
TUESDAY..... 1a.... UPN25 - Cox14  
WEDNESDAY .... 1a.... UPN25 - Cox14  
THURSDAY..... 1a.... UPN25 - Cox14  
FRIDAY..... 1a.... UPN25 - Cox14

Re: CLOSED CAPTIONING - Undue Burden Exemption Request

Program: **THE HOME SHOW, Las Vegas Nevada**  
Content: Visually tour New and Resale homes for sale in the Las Vegas area  
30-minute Weekly Program, 2 new shows every week, 52-weeks a year

To Whom It May Concern:

As Program Producer, I am seeking Exemption Status on Closed Captioning requirements for the following reasons:

1. Our shows take a video tour of new and resale homes in the Las Vegas market.
2. I feel that I already provide a substitute for the Closed Captioning requirements as I go to great lengths to provide all home details including price, location, amenities, incentives and disclaimers (if any) that are shown on Video via character-generated text as we tour each home. Providing Closed Captioning would be wholly redundant.
3. Because homes sell quickly in Las Vegas, I produce two (2) new show Editions every week. Shows air 52-weeks a year in Las Vegas.
4. I have recently checked into the cost of providing Closed Captioning on two fronts; outside provider which is very costly and with my distributors which is a little less. Either way, it's still very expensive for two new shows a week and it would present an undue financial burden as details of each home are already provided in text-on-screen as we tour new and resale homes.

Respectfully,

**JEANETTE DALEY**  
Producer  
The Home Show  
Las Vegas NV

- COPY -

JEANETTE DALEY - Producer  
THE HOME SHOW, Las Vegas  
(702) 870-5000 Fax 870-5023  
[Jeanette@LasVegasHomeShow.com](mailto:Jeanette@LasVegasHomeShow.com)  
1501 Ten Palms Court  
Las Vegas NV 89117

CGB-00-0177



THE HOME SHOW Weekly Showtimes:  
SAT 10:00 am UPN TV 25 Cox 14  
SUN 9:00 am ABC TV 13 Cox 13 HD 732  
SUN 6:30 pm NBC TV 3 Cox 3 HD 733  
MON 1:00 am UPN TV 25 Cox 14  
TUE 1:00 am UPN TV 25 Cox 14  
WED 1:00 am UPN TV 25 Cox 14  
THU 1:00 am UPN TV 25 Cox 14  
FRI 1:00 am UPN TV 25 Cox 14

3-6-06 - SENT THIS DATE Regular Postal Mail

To: Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
Attn: CGB Room 3-B431  
445 12<sup>th</sup> Street SW  
Washington DC 20554  
(202) 418-7092

RECEIVED

MAR 21 2006

Distribution Center

Re: CLOSED CAPTIONING - Request for Exemption under Section 79

Program: **THE HOME SHOW, Las Vegas Nevada**  
Content: Visually tour New and Resale homes for sale in the Las Vegas NV area  
30-minute Weekly Program 52-weeks a year, 2 Shows a week airing 4-times each

To Whom It May Concern:

We respectfully request exempt status on Closed Captioning (CC) for the following reasons:

**1. SUPPORTING TEXT ON TV:**

Our real estate TV program in Las Vegas includes all new and resale home details including price, location, amenities, incentives and disclaimers (if any) shown on video via character-generated text as we tour each home. Providing CC would be redundant and would cover-up supporting text on screen. For your video review, please log on to [LasVegasHomeShow.com](http://LasVegasHomeShow.com), 'Search By Map' page to view all streaming pieces on our Shows which change weekly.

**2. UNDUE BURDEN - FINANCIAL:**


We produce two (2) new show Editions each week (4 airings each). Our shows air 52-weeks a year. The cost of closed-captioning for 2 shows a week, 52wks a year @ \$575 per show would add \$59,800 a year to our production costs (see attached Rate Card from Transfer West, Las Vegas). This would cause us to incur costs we cannot recover and could put us in jeopardy of going dark after 10 years on-air.

**3. UNDUE BURDEN - SHOW DEADLINES:**

Transfer West requires a 2-week turnaround to close-caption. Our production schedule has always been 10-days out for new and resale production, we re-edit 2 Shows weekly and deliver to Stations for air. Instead, CC would force our deadline schedule to nearly 4-weeks out. In a fast-moving market where homes sell quickly, we would be unable to eliminate any "Sold" homes prior to air or change prices if any. A "Sold" home is more likely to occur within 4wks than 10days and could cause a "Sold" home to be unwillingly advertised.

Please consider our exempt status as the ramifications of added expense and deadlines would put our local program in serious jeopardy.

Sincerely,

  
JEANETTE DALEY  
Producer  
The Home Show, Las Vegas

## Jeanette Daley

**From:** Jeff Chesser [jchesser@transferwest.com]  
**Sent:** Monday, February 27, 2006 5:08 PM  
**To:** Jeanette Daly  
**Subject:** Closed Captioning Costs . . . "The Home Show" - Las Vegas

Jeanette,

As per your request, here is some information and pricing to do closed captioning:

For the more than 28 million Americans with hearing impairments, closed captioning provides a welcome service. With the aid of a closed captioning decoder, now a standard on most TV's, program dialogue appears as captions at the bottom of the television screen. These captions have a black background which covers up a small portion of the video at the bottom of the screen so it may interfere with any graphics you may have on the screen.

The dialogue on the program is transcribed into a script and using the time code from the video, the words are printed to correspond with the dialogue.

### PRICING:

30 second spot @ \$145.00  
5 minutes @ \$225.00  
15 minutes @ \$310.00  
30 minutes @ \$575.00  
45 minutes @ \$850.00  
60 minutes @ \$1,095.00  
75 minutes @ \$1,325.00  
90 minutes @ \$1,550.00  
120 minutes @ \$1,995.00

-Price normally does not include tape stock. But with a weekly show, I will include the tape stock at no additional charge.

Jeanette, I hope this gives you some additional information. If you have any questions, please don't hesitate to contact me.

Thanks,

Jeff Chesser  
Account Executive  
Transfer West Duplication

-----  
6171A McLeod Drive  
Las Vegas, NV 89120  
Phone: (702) 895-9900  
FAX: (702) 895-9909  
email: jchesser@transferwest.com  
website: <http://www.transferwest.com>

2/27/2006